



U.S. Department of Justice

United States Attorney  
District of Hawaii

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June 27, 2005

Pamela J. Byrne, Esq.  
Assistant Federal Public Defender  
300 Ala Moana Boulevard, Room 7-104  
Honolulu, Hawaii 96850-5269

Re: United States v. James Troiano, et al.  
Cr. No. 05-00261 DAE

Dear Ms. Byrne:


Please find enclosed a copy of the Indictment and discovery in the above-referenced case. I ask that you inspect the enclosed documents to confirm that you have received copies of Bates Stamped Nos. 1 through 211. If you find anything missing from this discovery package, do not hesitate to contact me.

Pursuant to Rule 16(b) of the Federal Rules of Criminal Procedure (FRCrP), the United States hereby requests reciprocal discovery, which is a continuing request. Also, pursuant to FRCrP Rule 12.1(a), the United States requests notice of an intent to utilize an alibi defense to any of the offenses in the above-referenced case. For purposes of the time, date, and place of the alleged violation(s), please refer to the appended reports. Finally, the United States will comply with Brady v. Maryland, 373 U.S. 83 (1963). It is not presently aware of any Brady material.

Should you have any other questions regarding this matter, please feel free to contact me at 440-9272.

Very truly yours,

EDWARD H. KUBO, JR.  
United States Attorney  
District of Hawaii

By   
CLARE E. CONNORS  
Assistant U.S. Attorney

Enclosures

**EXHIBIT** E